

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
MAURA DIAZ**

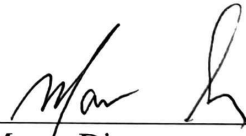
MAURA DIAZ, hereby declares and verifies the truth of the following, under penalty
of perjury under the laws of the United States of America, pursuant to Title 28, United States Code,
Section 1746:

1. I am the paralegal in charge of the Independent Medical Examination ("IME") calendar at Zemsky & Salomon, P.C., and I am fully familiar with the facts set forth herein. My employer has been using the services of IME Companions LLC ("Companions") since 2019.

2. I have been informed that Carlos Roa ("Roa") has submitted an affidavit to this Court suggesting that I called plaintiff IME Watchdog, Inc. ("Watchdog") on behalf of Safa Gelardi ("Safa"). Roa is mistaken.

3. The truth is that I called Watchdog at the request of my boss, Jason Zemsky, Esq., because Roa had been calling our firm. Mr. Zemsky asked me to call him back and to find out what was going on. I finally spoke with Roa on January 31, 2023. At that time, Roa told me that he could speak to me because his colleague had left the office. Roa spoke to me in Spanish. He bashed and disparaged both Safa and Companions by warning us to stay away from Safa and Companions because the FBI was involved and Safa would be going to jail.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 17, 2023.


Maura Diaz

Sworn to before me this
17th day of March, 2023


NOTARY PUBLIC

JASON M. ZEMSKY
Notary Public, State of New York
Registration #02ZE8286222
Qualified in Nassau County
Commission Expires Jan. 30, 2024